

# INFORMATION BULLETIN

## JOB TRAINING PARTNERSHIP ACT

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TO: SERVICE DELIVERY AREA ADMINISTRATORS  
PRIVATE INDUSTRY COUNCIL CHAIRPERSONS  
JTPD PROGRAM OPERATORS  
EDD JOB SERVICE OFFICE MANAGERS  
JTPD STAFF

SUBJECT: REVISIONS TO YEAR-END REPORTS FOR PY 1996-97 AND  
SUBSEQUENT PROGRAM YEARS

The Job Training Partnership Division (JTPD) has received a number of requests from Service Delivery Areas (SDA) for approval to enter additional termination records or to revise the status of terminations included in their year-end reports for Program Year (PY) 1996-97. This Information Bulletin documents the state's position on late or revised terminations for PY 1996-97 and for subsequent program years.

Due to the federal reporting requirements and time frames, the state cannot accept revised or additional terminations from SDAs after the August 20 deadline for SDAs to submit revisions to their fourth quarter reports. Section 106 (j)(3) of the Job Training Partnership Act (JTPA) requires the Governor to provide the Department of Labor (DOL) with information on the performance outcomes achieved by each SDA on the six core standards and their eligibility to receive an incentive award. To comply with this requirement, JTPD uses the final reports received from SDAs on or before the August 20 deadline to calculate final performance outcomes and to determine the distribution of the incentive funds. This information is reported to DOL on September 30, 1997, in the annual Performance Status Summary Report and the Standardized Program Information Report (SPIR), as required.

Each year, the annual reports submitted to DOL provide information that is used to respond to Congressional inquiries regarding the effectiveness of state JTPA programs. This year, the outcomes reported to DOL for PY 1996-97 will also be used as the basis for comparing the performance of California's SDAs with others in the nation, as part of the National Performance Improvement Initiative. This review is scheduled for late January or early February 1998. It is critical to maintain the integrity of our data system to ensure that it accurately reflects our performance outcomes. In responding to the results of the last

review, JTPD was successful in persuading DOL to eliminate Tier II SDAs from the letter that was sent to the Governor. Reporting inconsistencies could limit our ability to challenge the validity of data used by DOL to evaluate our performance, if similar negotiations are required this time.

We are aware that the Compliance Review Division (CRD) is conducting a statewide review of PY 1996-97 Title II-A Adult and Older Worker and Title II-C programs. The purpose of this review is to monitor each SDA's administration of these programs for compliance with all state and federal laws and regulations related to the Job Training Partnership Act. If errors in Title II outcomes reported for PY 1996-97 are identified by the monitors, they will be documented as findings in the monitoring reports. Recommendations for corrective actions relative to these findings could include documentation of the clients name, case record number, original outcome claimed, correct outcome, and an explanation of the changes applicable to the year-end data previously reported. SDAs should not attempt to correct these errors by submitting revised reports for PY 1996-97 via the state Job Training Automation (JTA) system. The JTPD will review the monitoring reports to identify technical assistance needs and to determine if further action is required to ensure the validity of performance outcomes in cases where findings appear to be significant.

If a decision is made to enter revisions for PY 1996-97 into the local JTA database, SDAs are strongly advised to maintain a tight audit trail by fully documenting the changes so that reconciliation to the state JTA database can be made, if necessary. Documentation should include the information submitted to the CRD in response to the monitoring findings, as described above. A copy of the documentation should be provided to the Data Analysis Unit in JTPD at (916) 654-9586.

The CRD estimates that their review will be completed in all SDAs by late December 1997 or early January 1998. In an effort to maximize the useful life of the incentive funds, JTPD is proceeding with the distribution of the incentive awards prior to the completion of this review. However, should the final results of this review and any subsequent investigations demonstrate that the data on which an SDA's performance outcomes were calculated may be invalid, the incentive funds may be subject to recapture by the JTPD.

For PY 1997-98 and subsequent program years, no changes will be made to the state or local JTA databases after the close of a program year. The SDAs that discover clients who should have been terminated in a closed program year will be required to terminate them in the current program year. Details regarding this requirement will be outlined in a reporting directive that will be issued for review and comment prior to the second quarter reporting deadline (January 15, 1998).

If you have any questions, please contact Deborah Cusimano, Manager of the Data Analysis Unit, at (916) 653-4292.

/S/ BILL BURKE  
Acting Assistant Deputy Director